

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket #06-36**

Marlene Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Annual 64.2009(e) CPNI Certification for 2009

Date filed: Thursday, February 25, 2010

Name of company covered by this certification: Fidelity Communications, Co. (parent company) and its subsidiaries

Form 499 Filer IDs: Fidelity Telephone Co. - 802074

Fidelity Communications Services I, Inc. - 820922

Fidelity Communications Services II, Inc. - 822856

Fidelity Communications Services III, Inc. - 827644

Fidelity Networks Inc. - 820564

Fidelity Long Distance Inc. - 819186

Fidelity Systems Plus, Inc. - 816312

Fidelity Cablevision, Inc. - 827412

Name of signatory: Dave Beier **Title of signatory:** VP - Regulatory

I, Dave Beier, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

Fidelity has not taken any actions against data brokers in the past year regarding any breach of CPNI information.

Fidelity has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Fidelity represents and warrants that the above certification is consistent with 47.C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. Fidelity also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: Dave Beier

Print Name: Dave Beier **Title:** VP - Regulatory **Date:** Thursday, February 25, 2010

CC: Best Copy and Printing, Inc.

Statement of Compliance with the FCC's Customer Proprietary Network Information "CPNI" Rules and Regulations

Fidelity Communications Co. and subsidiaries' ("Fidelity") operating procedures certify that Fidelity is in compliance with the FCC's rules and regulations regarding Customer Proprietary Network Information (CPNI).

All of Fidelity's employees are aware that disclosure of our customers' CPNI information without obtaining the proper customer approval is a violation of the FCC's rules set forth in 47 U.S.C. 222 and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R. 64.2001 through 64.2009. Fidelity has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

Fidelity has taken the steps and has internal procedures in place so as to educate our employees through training regarding the FCC's rules and regulations as to when and where CPNI information may be released. The employees that have access to this information are aware that the FCC prohibits the disclosure of such information without the proper customer consent and as allowed by law and the FCC's rules.

Fidelity maintains a record of all sales and marketing campaigns and reviews any proposed outbound marketing requests

Any employee that violates Fidelity's CPNI operating procedures is subject to disciplinary action, up to dismissal.

Fidelity mandates yearly CPNI training for all employees to ensure up to date compliance with any new regulations.

Fidelity has implemented safeguards for our customers' protection against pretexters consistent with the FCC's requirements in Section 47 C.F.R. 64.2010.

Fidelity will provide written notice within five business days to the Commission of any instance where the opt-out mechanism did not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.